REMARKS

The Examiner is thanked for the careful examination of the application.

However, in view of the following remarks, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

Claims 1 – 8, 10 – 15, and 17 – 19 have been rejected under 35 USC 103(a) as being unpatentable over USP 6,130,757, hereinafter *Yoshida*, in combination with USP 6,208,273, hereinafter *Dye*.

The Examiner relies upon *Yoshida* for an alleged teaching of a data processing apparatus comprising one or more compression/decompression units that compress the data for the input job and decompress the compressed data. Applicants reserve the right to challenge this conclusion at a later time, if necessary and appropriate.

The Examiner acknowledges that *Yoshida* does not expressly disclose a controller that, when a processing request is issued for processing of the data for a next job by said compression/decompression unit(s) during processing of the data for a current job by said compression/decompression unit(s), obtains the processing wait period between pages of said current job, determines whether or not the data for said next job will undergo compression or decompression based on a comparison between the minimum processing time for said next-job data and said processing wait period, and controls the execution of processing of said next job by said compression/decompression unit(s) between pages of said current job in accordance with this determination. To overcome this deficiency, the Examiner relies on *Dye*.

In particular, the Examiner alleges that *Dye* discloses a controller that, when a processing request is issued for processing of the data for a next job by said

compression/decompression unit(s) during processing of the data for a current job by said compression/decompression unit(s), obtains the processing wait period between pages of said current job, determines whether or not the data for said next job will undergo compression or decompression based on a comparison between the minimum processing time for said next-job data and said processing wait period, and controls the execution of processing of said next job by said compression/decompression unit(s) between pages of said current job in accordance with this determination. To support this conclusion, the Examiner relies upon column 21, lines 63 – 67 of *Dye*.

However, the cited portion of *Dye* merely describes that the compression cache control unit 281, along with the switch unit 261, determine the transaction type, priority and control required to complete the transaction by either the L3 data cache 291, the parallel compression and decompression unit 251 or the main memory interface 560. Column 21, lines 63 – 67 of *Dye*. The cited portion of *Dye* is completely silent with regard to (1) obtaining the processing wait period between pages of said current job, (2) determining whether or not the data for said next job will undergo compression or decompression based on a comparison between the minimum processing time for said next-job data and said processing wait period, and (3) controlling the execution of processing of said next job by said compression/decompression unit(s) *between pages* of said current job in accordance with this determination.

Basically, *Dye* simply acknowledges that priority and control are determined. It does not explain how the priority and control are determined. Accordingly, Applicants submit that neither of the applied references teach the claimed

combination of claim 1, and in particular, the combination that includes, among other

elements:

(1) obtaining the processing wait period between pages of said current job,

(2) determining whether or not the data for said next job will undergo compression or

decompression based on a comparison between the minimum processing time for

said next-job data and said processing wait period, and

(3) controlling the execution of processing of said next job by said

compression/decompression unit(s) *between pages* of said current job in accordance

with this determination.

Based on the foregoing, Applicants submit that the applied references do not

teach or even suggest the combination of claim 1. However, Applicants also reserve

the right to challenge the Examiner's analysis of *Dye* and the Examiner's alleged

motivation for combining *Dye* with *Yoshida*.

Claims 2 – 3 depend from claim 1, and are thus also patentable over the

applied art.

Claim 4 defines a data processing apparatus that includes, among other

things, a controller that, when a processing request is issued for processing of the

data for a next job by said compression/decompression unit(s) during processing of

the data for a current job by said compression/decompression unit(s), identifies an

attribute of said next job, determines whether or not the data for said next job will

undergo compression or decompression based on said identified next-job attribute,

and controls the execution of processing of said next job by said

compression/decompression unit(s) between pages of said current job in accordance

with this determination.

Such a controller is also not taught by *Dye*. Basically, *Dye* simply acknowledges that priority and control are determined. It does not explain how the priority and control are determined. Accordingly, Applicants submit that neither of the applied references teach the claimed combination of claim 4, and in particular, the combination that includes, among other elements:

(1) identifies an attribute of said next job,

(2) determines whether or not the data for said next job will undergo compression or decompression based on said identified next-job attribute, and

(3) controls the execution of processing of said next job by said compression/decompression unit(s) between pages of said current job in accordance with this determination.

Based on the foregoing, Applicants submit that the applied references do not teach or even suggest the combination of claim 1. Claims 5 – 10 depend from claim 4, and are thus also patentable.

Claims 11 – 19 are patentable over the applied art at least for the reasons set forth above with respect to claims 1 and 4.
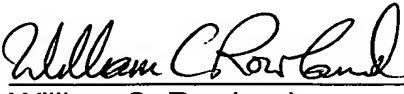
Accordingly, the Examiner is respectfully requested to withdraw the rejections. In the event that the Examiner persists with the rejections, the Examiner is requested to specifically identify where *Dye* teaches the three elements identified above in claim 1 and the three elements identified above in claim 4.

If there are any questions concerning this response, or the application in general, the Examiner is encouraged to telephone the undersigned.

Respectfully submitted,

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